

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MIGUEL MALDONADO,)	
)	No. 08 C 1954
Plaintiff,)	
)	Judge Aspen
v.)	
)	Magistrate Judge Nolan
P.O. LENNY PIERRI Star No. 10956,)	
P.O. VINCENT STINAR Star No. 4017,)	Jury Demand
individually, and THE CITY OF)	
CHICAGO,)	
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO’S AGREED MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO
PLAINTIFF’S FIRST AMENDED COMPLAINT**

Defendant City of Chicago (“City”), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully moves for an extension of time until 14 days following the appearance of co-defendants Lenny Pierri and Vincent Stinar (collectively referred to as “Defendant Officers”) to answer or otherwise plead to Plaintiff’s First Amended Complaint. In support of this motion, the City states the following:

1. Plaintiff filed his First Amended Complaint on August 13, 2008, adding the Defendant Officers as named defendants.
2. Defendant Officers have not yet been served with Plaintiff’s First Amended Complaint and thus have not yet appeared in this matter.
3. Undersigned counsel is in the process of reviewing Plaintiff’s First Amended Complaint and gathering documents responsive to the First Amended Complaint, but will be better able to respond after the Defendant Officers have appeared in this matter.

4. This request is made not to delay the proceedings but rather to allow the City to respond properly to the allegations in Plaintiff's First Amended Complaint.

5. Undersigned counsel spoke with one of the attorneys for Plaintiff, Leslie McCoy of Ed Fox and Associates, on August 19, 2008, who stated that she has no objection to the City's request for an extension of time to answer or otherwise plead.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time until 14 days after the Defendant Officers have appeared to answer or otherwise plead in response to Plaintiff's First Amended Complaint; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel
City of Chicago

BY: /s/ Kathleen D. Manion
KATHLEEN D. MANION
Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing **Notice of Motion and City of Chicago's Agreed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's First Amended Complaint** to be served upon Leslie McCoy of Ed Fox and Associates, on this 19th day of August, 2008.

/s/ Kathleen D. Manion
KATHLEEN D. MANION
Assistant Corporation Counsel